

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

CIVIL ACTION NO.: 05-11652 WGY

DEFENDANT'S PROPOSED VOIR DIRE TO THE VENIRE

American Airlines hereby requests that this Court pose the following questions to the *venire*.

1. Do you, a member of your family, or any close friend know the attorneys or paralegals involved in this case, Michael Kirkpatrick of Public Citizen Interest Group, Doreen Cantelo and David Godkin of Birnbaum & Godkin, or Michael Fitzhugh, Amy Cashore Mariani and Melissa Wangenheim of Fitzhugh, Parker & Alvaro? Please note that while Attorney Mariani is not in the courtroom today because she recently gave birth, you will hear previously recorded testimony at this trial elicited by her.
2. Do you, a member of your family, or any close friend know the plaintiff, John D. Cerqueira, or any of his family members?
3. Do you, a member of your family, or any close friend know any of the following individuals, who may be called to testify at trial as witnesses?

- John D. Cerqueira
- Sally Walling
- Lois Sargent
- Amy Milenkovic
- Donald Ball
- John Ehlers
- Ynes Flores
- Nicole Traer
- Rhonda Cobbs
- Craig Marquis
- Richard Faulk
- Barry Blumenthal
- Douglas Laird
- John Beardslee
- Martin J. Kelly, M.D.
- Trooper Daniel E. Sullivan, East Boston, MA
- Trooper Fredrick F. Yee, East Boston, MA
- Trooper Joseph J. Boike, East Boston, MA
- Trooper Donald J. Ventura, East Boston, MA
- Trooper David Crowther, East Boston, MA

4. Are you, a member of your family, or any close friend employed by an airline?
5. Have you, a member of your family, or any close friend been employed in the past by an airline?
6. Are you, a member of your family, or any close friend employed in the transportation industry?
7. Have you, a member of your family, or any close friend been employed in the past in the transportation industry?
8. Have you, a member of your family, or any close friend been removed from any form of transportation, including, but not limited to, an airliner, train, or bus?

9. Have you, a member of your family, or any close friend been denied transport on any form of transportation, including, but not limited to, an airliner, train or bus that routinely serves the public?
10. Have you, a member of your family, or any close friend been the subject of a criminal investigation?
11. Have you, a member of your family, or any close friend been questioned by local, state or federal law enforcement?
12. Have you, a member of your family, or any close friend been detained by local, state or federal law enforcement?
13. Have you, a member of your family, or any close friend been arrested by local, state or federal law enforcement?
14. Have you, a member of your family, or any close friend been convicted of a crime?
15. Are you, a member of your family, or any close friend employed by a law enforcement agency, including, but not limited to, a police department, the Massachusetts State Police or the Federal Bureau of Investigation?
16. Are you, a member of your family, or any close friend employed by an agency or entity involved with transportation security, including, but not limited to, the Transportation Security Administration, Massport, or the Department of Homeland Security?
17. Are you, a member of your family, or any close friend employed as a first responder, such as a member of a fire department or paramedic unit?

18. Are you, a member of your family, or any close friend an active or reserve member of the United States Armed Forces, including, but not limited to, the Army, Navy, Air Force, Marines or Coast Guard?
19. Have you, a member of your family, or any close friend been a party in a lawsuit?
20. Have you, a member of your family, or any close friend been a witness in a lawsuit?
21. Have you, a member of your family, or any close friend been a victim of a crime?
22. Have you, a member of your family, or any close friend made a complaint of discrimination to a government agency, including, but not limited to, the Massachusetts Commission Against Discrimination, the Equal Employment Opportunity Commission, or a state or federal court?
23. Have you, a member of your family, or any close friend made a complaint of discrimination to an employer?
24. Do you believe that you, a member of your family, or any close friend has been the victim of discrimination?
25. Have you, a member of your family, or any close friend filed a complaint alleging a violation of civil rights under state or federal law?
26. Do you believe that you, a member of your family, or any close friend has been the subject of a civil rights violation?
27. Have you, a member of your family, or any close friend made contributions to the Public Citizen Interest Group?

28. Have you, a member of your family, or any close friend made contributions to any organization or entity formed or operated by Ralph Nader?
29. Have you voted in any contested election in the past for Ralph Nader?
30. Are you, a member of your family, or any close friend employed in the field of mental health, such as a psychiatrist, psychologist, licensed therapist or social worker?
31. Have you, a member of your family, or any close friend been employed in the past in the field of mental health, such as a psychiatrist, psychologist, licensed therapist or social worker?
32. Do you have any beliefs regarding large corporations that would affect your ability to be a fair and impartial juror in these proceedings?

American Airlines requests individualized examination of each juror who responds in the affirmative to any of the foregoing questions.

Respectfully submitted,
AMERICAN AIRLINES, INC.
By Its Attorneys,

/s/ Michael A. Fitzhugh
Michael A. Fitzhugh, (BBO 169700)
Amy Cashore Mariani, (BBO #630160)
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 28, 2006.

/s/ Michael A. Fitzhugh

Michael A. Fitzhugh